

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

Criminal No. 11-cr-10212-JLT

- | | | |
|------------|------------------------------|---|
| 1. | JOHN WILLIS |) |
| | a/k/a "Bac Guai John" |) |
| 2. | BRANT WELTY |) |
| 3. | PETER MELENDEZ |) |
| | a/k/a "Shrek" |) |
| 4. | AIBUN ENG |) |
| 5. | BRIAN BOWES |) |
| 6. | KEVIN BARANOWSKI |) |
| 7. | MICHAEL CLEMENTE |) |
| | a/k/a "Ricky Martin" |) |
| 8. | MICHAEL SHAW |) |
| 9. | MARK THOMPSON |) |
| 10. | STEVEN LE |) |
| | a/k/a "Little Stevie" |) |
| 11. | VINCENT ALBERICO |) |
| 12. | BRIDGET WELTY |) |
| 13. | ANEVAY DUFFY |) |
| | a/k/a "Homegirl" |) |
| | Defendants. |) |

UNITED STATES' FIRST BILL OF PARTICULARS FOR FORFEITURE OF ASSETS

The United States of America, by and through its attorney, Carmen M. Ortiz, United States Attorney for the District of Massachusetts, hereby files the following Bill of Particulars for Forfeiture of Assets.

On May 26, 2011, a federal grand jury sitting in the District of Massachusetts returned an Indictment charging Defendants, in Count One, with Conspiracy to Distribute and Possess with Intent to Distribute Oxycodone, Marijuana and Human Growth Hormone, in violation of 21 U.S.C. § 846. The Indictment also alleges that upon conviction of the offense in violation of 21 U.S.C. § 846 set forth in Count One, Defendants jointly and severally, shall forfeit to the United States, pursuant to 21 U.S.C. §853: (1) any and all property constituting or derived from any proceeds

obtained directly or indirectly as a result of the charged offense; and (2) any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense.

Pursuant to, and without limiting in any manner the Indictment's Drug Forfeiture Allegation, the United States hereby gives notice that it is seeking forfeiture of, without limitation, the following::

Approximately \$42,940.00 in United States currency, seized by the Dillon, South Carolina, Police Department from Defendant JOHN WILLIS (who falsely identified himself to police as Defendant BRANT WELTY) and Defendant BRANT WELTY, on or about March 24, 2011, on Route 95 in Dillon, South Carolina, turned over to the Drug Enforcement Administration for federal forfeiture, numbered for tracking purposes as asset No. 11-DEA-545304, and claimed on or about May 25, 2011, by Defendant BRANT WELTY via a sworn statement submitted by WELTY to DEA Forfeiture Counsel.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Richard L. Hoffman
TIMOTHY E. MORAN
RICHARD L. HOFFMAN
Assistant United States Attorneys
U.S. Attorney's Office
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Dated: July 28, 2011

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the Electronic Court Filing system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Dated: July 28, 2011

/s/ Richard L. Hoffman
RICHARD L. HOFFMAN
Assistant U.S. Attorney